

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

CHRISTIAAN H. HIGHSMITH (CABN 296282)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
christiaan.highsmith@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 23-CR-225 JD
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER TO
)	EXCLUDE TIME UNDER THE SPEEDY TRIAL
v.)	ACT FROM AUGUST 28, 2023, TO SEPTEMBER
)	25, 2023
GREGORY FINKELSON,)	
)	
Defendant.)	

On July 25, 2023, the Grand Jury returned an indictment in this case. Dkt. 80. On July 28, 2023, the defendant made his initial appearance and entered a not guilty plea. Dkt. 84. Also at the initial appearance, the Court set this matter for a status hearing in District Court on August 28, 2023, and ordered the exclusion of time under the Speedy Trial Act from July 28, 2023, to August 28, 2023. Dkt. 86. On August 25, 2023, the Court continued the status hearing to September 25, 2023. Dkt. 90.

The government is in the process of producing voluminous additional discovery in this case. Defense counsel is reviewing already-produced discovery and requires additional time to review new discovery and prepare for trial.

Accordingly, the parties stipulate and request that time between August 28, 2023, and September 25, 2023, be excluded under the Speedy Trial Act for the effective preparation of counsel. *See* 18

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
Case No. 23-CR-225 JD

1 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by
2 excluding the time from August 28, 2023, through September 25, 2023, from computation under the
3 Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.
4 § 3161(h)(7)(A), (B)(iv).

5
6 IT IS SO STIPULATED.

7 DATED: August 28, 2023

/s/
CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney

9 DATED: August 28, 2023

/s/
Anthony J. Brass, Esq.
Counsel for Defendant GREGORY FINKELSON

~~PROPOSED~~ ORDER

For the reasons stated above by the parties and because good cause has been shown, the time between August 28, 2023, and September 25, 2023, is excluded from the running of the speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(iv). Failure to grant the continuance would deny the defendant's counsel the reasonable time necessary to prepare, taking into account the exercise of due diligence. Further, the requested continuance and exclusion of time are in the interests of justice and outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

DATED: September 7, 2023



HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE